



Disclosure Brochure
(Part 2A of Form ADV)

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This brochure provides information about the qualifications and business practices of Touchdown Capital Advisors, Inc. d/b/a Money4Front. If you have any questions about the contents of this brochure, please contact us at: 813-444-1005, or by email at: info@money4front.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Money4Front is available on the SEC's website at www.adviserinfo.sec.gov. The firm's CRD number is: 158356

Registration does not imply a certain level of skill or training.

Item 2: Material Changes

This is an amendment of Part 2A of Form ADV for Touchdown Capital Advisors, Inc. d/b/a Money4Front ("TDCA"). The following material changes occurred since the last filing.

INCORPORATION OF CONVENTIONAL FINANCIAL PLANNING AND PORTFOLIO MANAGEMENT TOOLS:

We have recently expanded our offerings to include conventional financial planning and portfolio management tools. As such, our patent-pending sports-themed tools are now purely optional at the user's discretion.

FILING OF FICTITIOUS NAME FAME FILING & CHANGE IN CONTACT INFORMATION:

On April 29th, 2013, we filed for to use Money4Front as a fictitious name (d/b/a) with the State of Florida and we now use Money4Front as our primary business name. Our primary address is unchanged and our telephone numbers remain the same. However, we have changed our primary URL and e-mail contact information as follows:

URL: <https://www.money4front.com>

e-mail: info@money4front.com

LAUNCH OF MONEY4FRONT WEBSITE:

On May 3, 2013, we launched the Money4Front website, which can be found at the URL listed above. Additionally, we have expanded the scope and vision of our services to include core content on relevant subject matter. Licensees will have access the improved versions of our patent-pending technologies described herein.

DISCONTINUATION OF SPORTS LEVER NAME AND WEBSITE:

On May 3, 2013, we will discontinue our use of the d/b/a Sports Lever and will cease operating the Sports Lever website. The purpose for this discontinuation of Sports Lever is to modify our brand to be less associated with the sports theme and more inclusive of conventional financial planning and portfolio management.

TRANSITION OF KEY MEMBER OF MANAGEMENT TEAM:

Aaron Barman, formerly our SVP of Business Development, has transitioned to the role of an advisor to the firm. In this capacity, he will still provide business development services for the company, but on a part-time basis.

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Item 4: Advisory Business

Touchdown Capital Advisors, Inc. ("TDCA"), formed in June, 2011, offers patent-pending financial management software called Money4Front™, which is licensed to users through the money4front.com website. Money4Front includes cutting edge financial management tools that are fully-integrated and easy-to-use. It also includes a suite of patent-pending technologies that apply the concepts of the game of Football to personal finance and portfolio management. We deliver our software product through a SaaS (Software-as-a-service) model where we provide access through the cloud. To become a registered Licensee, website visitors need to sign up at the web site using their e-mail address and a uniquely created password. David B. Hirsch is the firm's principal.

Our technology seamlessly integrates financial planning and portfolio management and provides licensees tools for financial assessment and planning as well as portfolio construction and analysis. Additionally, we have integrated tools that show licensees the projected financial impact portfolios and a tool for determining portfolio target allocations and rebalancing.

Financial Planning:

Conventional: Our conventional financial planning tool simplifies a Licensee's current financial situation into a simple, easy-to-understand format. It also provides them with a comprehensive financial assessment report that will guide them in formulating a game plan for retirement. Additionally, we offer a tool called Scenario Runner that allows the user to make changes to their inputs to and see the impact on their financial situation. The collective changes represent the user's financial plan and is provided in a comprehensive report.

American Football: We offer a theme based on American football that translates a Licensee's current financial situation into the scoreboard of a football game. The scoreboard provides a snapshot of financial health and a retirement projection all in one. Each element of the scoreboard has significance. For example, the game starts when the Licensee enters the workforce and ends when the Licensee expects to retire. As such, the game clock and quarter tell the Licensee how much time is remaining before their expected date of retirement. The possession arrow determines whether they are saving money and on offense, or depleting their savings and on defense. The score provides the Licensee with an estimate as to whether they will be able meet their retirement needs before the game ends. The 'Home' score represents an estimate of the number of years the Licensee should be able to enjoy their current lifestyle upon retirement based on their present financial situation and plan. The 'Away' score reflects the number of years of post-retirement life the Licensee should plan for based on standard IRS Life Expectancy Tables.

Portfolio Management:

Conventional: We offer a variety of conventional portfolio construction tools that make building a portfolio fast and easy. Once a portfolio has been built, the user has access to a detailed portfolio analysis that allows them to determine whether the portfolio meets their needs. We also provide an additional report that shows how the implementation of the portfolio is projected to impact their financial situation.

American Football: Our portfolio management tool provides Licensees with an easy-to-use, comprehensive tool to construct and manage a fully-diversified portfolio in the same way one would manage a Fantasy Football Team. Money4Front™ has been designed to mimic user interfaces commonly seen in Fantasy Football leagues. Initially, it the Licensee inserts their risk profile and

Investment objective. The application then recommends a standard football formation based. Each location on a Formation Map equates to a different Asset Class. Asset Classes are numbered 1-8 based on risk, with 1 being the least risky and 8 being the most. Next, the Licensee must select an Asset Category for each Asset Class. In the final stage of portfolio construction, the Licensee selects specific assets for each player position one player at a time. Money4Front has hard-coded rules that alert the Licensee in order to prevent the misallocation or excessive concentration of assets. For example, the team they select must be rational (e.g. having a team of 11 receivers would not be permitted). The end result is a portfolio that is diversified across a variety of Asset Classes and Categories. When the user is finished drafting their team, they will have access to a target allocations report that will tell them the number of units or shares to purchase. They then simply take the this report to their broker to fill the positions.

Service #1: Software Licensing:

We offer the following four versions of our software platform:

- **Money4Front Premium:** Designed for do-it-yourself individual investors.
- **Money4Front Professional:** Designed for financial advisors and planners.
- **Money4Front Institutional:** A white labeled-version of Premium designed for institutions.
- **Money4Front DCP:** Designed for defined contribution plan sponsors and consultants.

Service #2: Pre-Fabricated Portfolios (Premium Portfolios)

Some Licensees will have access to pre-fabricated portfolios constructed by us, or third-parties, and are segmented according to the risk profile and the stated portfolio objective (Income, Growth & Income, or Growth). Premium Portfolios are specifically for information purposes only and Licensees are encouraged to review the portfolio as a whole and the individual assets contained therein for suitability.

We consider Premium Portfolios to be semi-customizable or semi-tailored. These portfolios are designed to accommodate Licensees based on their risk profile and stated investment objective. It is possible that two Licensees with the same risk profile and investment objective may face substantially different personal financial circumstances. The application does not take into consideration every aspect of a Licensee's personal financial circumstance. We merely provide the Licensee with a discrete set of portfolios segmented according to the risk profile classifications established by our technology. Licensees are free to choose any Premium Portfolio they like, even portfolios that are designated for people with a higher risk profile or different stated investment objective. Premium Licensees receive a discount when purchasing Premium Portfolios.

Service #3: Turn-Key Service:

We do not offer Investment Supervisory Services. However, we do plan on offering a discount portfolio management service called the Turn-Key Service. The Turn-Key Service will provide the full management of a selected Premium Portfolio through a master account held at a qualified custodian. The Turn-Key Service is designed to appeal to Licensees who are looking for a balance between the do-it-yourself approach and the full-service approach and do not need assistance from an outside advisor in the selection or suitability of a particular portfolio or the assets contained therein, but want a third-party to manage their accounts and assume ultimate responsibility for trade execution, portfolio rebalancing, etc.. We anticipate charging Licensees between from 50 to 150 basis points for this service depending on the amount of assets under management.

Service #4: Third-Party Advisor Account Management Services:*Advisor Referral Service ("ARS"):*

An alternative service to the Turn-Key Service is our Advisor Referral Service (ARS). The ARS pairs prospects who are looking for full-service account management with qualified third-party advisors who have licensed our professional product. Unlike the Turn-Key Service, prospects who utilize the ARS will want the third-party advisor to both assist in the construction of a suitable portfolio, but also in its management.

We do not anticipate charging Licensees a fee for the ARS. Instead, we expect to charge the third-party advisors a variety of fees, including fees to be registered on our site (please see Item 14). We do not determine the manner and method that third-party advisors registered with the ARS service charge for their services. Responsibility and accountability for the management of Licensee portfolios are the sole responsibility of our the selected advisory firms they have chosen. We are not involved in the management of these portfolios at any level. Additionally, some third-party advisors will require a minimum amount of assets before they will consider taking on a Licensee as a client. This minimum is set by each individual third-party advisor.

Wrap Fee Programs: At present, we do not participate in any wrap fee programs.

Licensee Assets Under Management: As of the date of this filing, TDCA has no amounts under management, neither discretionary or non-discretionary.

Item 5: Fees and Compensation**Fees for Service #1: Software Licensing**

Fees for the Premium Subscription Service and Premium Portfolios are subject to the following schedule:

(1) Premium:

Licensees who elect to subscribe to the Premium Subscription Service pay the following fees:

- Monthly Subscription: \$49.95 per month
- Annual Subscription: \$499.50 per year (equal to 2 months free, or a 17% discount)

(2) Professional:

Licensees who elect to subscribe to the Professional Subscription Service pay the following fees:

- Monthly Subscription: \$249.95 per month
- Annual Subscription: \$2,499.50 per year (equal to 2 months free, or a 17% discount)

(3) & (4) Institutional & DCP:

Fees for these services are on a case-by-case basis and vary based on a number of factors.

We reserve the right, in our sole discretion, to charge a lower licensing fee for our software to any party and the fees you may be paying could be different than the fees paid by other parties for the same subscription and services.

Payment of Service #1: Software Licensing Fees**Payment of Fees for the Premium Subscription:**

We offer monthly and annual subscriptions. Fees are paid automatically via credit card or PayPal at the beginning of the Licensee's billing cycle at the then published price. Monthly subscribers who cancel do not receive a partial or pro-rated refund for the remainder of the monthly period in which they cancel. Annual subscribers receive an up-front discount for paying for several months in advance. If an annual subscriber cancels, their subscription will be automatically converted to a monthly subscription at the then published monthly rate. They would then be eligible for a refund for the months that have been paid for but not utilized. As with normal monthly subscriptions, they would not be eligible for a partial or pro-rated refund for the remainder of the monthly period in which they cancel. Licensees may terminate their account at anytime through the account management function on the Money4Front website and no further charges will be made to their bank or credit card. Additional account restrictions and a more detailed description of our billing and refund policies can be found in the Licensee Agreement.

Fees for Service #2: Pre-fabricated Portfolios (Premium Portfolios)

We sell our Premium Portfolios for a one-time fee of \$99.95.

Fees for Service #3: Turn-Key Service:

We have yet to implement this service; however, we anticipate we will charge between 50 to 150 basis points annually based on the assets under management of the specific client.

Fees for Service #4: Third-Party Advisor Account Management Services:

We do not charge Licensees a fee for using the Turn-Key Service or ARS.

Payment of Service #3: Third-Party Discount Account Management Services

We do not charge Licensees a fee for using the Turn-Key Service or ARS; however, we do receive compensation from our partner advisory firms for the Turn-Key Service and registered advisory firms with the Find A Coach Service (please see Item 14).

Item 6: Performance-Based Fees

TDCA shall not be compensated on the basis of a share of capital gains upon or capital appreciation of the funds or any portion of the funds of the Licensee. TDCA reserves the right to provide its services to other types of Licensees (such as participants in 401(k) plans) and in other contexts. TDCA also reserves the right to vary its fee structure for such other types of Licensees and in such other contexts.

Item 7: Types of Licensees

We do not provide investment advice; however, the Money4Front Application has been designed to cater to the following types of Licensees:

- Individuals, and High-Net-Worth Individuals,
- Financial Advisors and Professionals,
- Financial Institutions,
- Defined Contribution Plan Sponsors, Consultants and Participants.

Item 8: Methods of Analysis, Investment Strategies and Risk of Loss

Licensees will have access to our Premium Portfolios, which contains portfolios that we have created to provide our premium subscribers with examples on portfolios with specific risk profiles and investment objectives. OUR PORTFOLIOS, ALONG WITH ANY THIRD-PARTY CREATED PORTFOLIOS AVAILABLE IN THE PORTFOLIO MARKET, ARE FOR INFORMATIONAL PURPOSES ONLY AND DO NOT CONSTITUTE A RECOMMENDATION AS TO A PORTFOLIO'S SUITABILITY OR THE SUITABILITY OF ANY OF THE ASSETS CONTAINED THEREIN. We have attempted to restrict the assets we include in our portfolios to investment vehicles that provide lower cost structures such as Electronically Traded Funds ("ETFs"), Index Funds, or no-load mutual funds. From time-to-time, we may include a security that bears a higher cost structure if we feel that the potential return outweighs the additional costs.

The value of ETFs, Index Funds and mutual funds fluctuate, both increasing and decreasing in value. There is no guarantee that a Licensee will make money or avoid losing their investment by investing in funds. In particular, past performance is no guarantee of future results. See fund prospectuses for a detailed discussion of risks associated with each specific fund.

Investing in ETFs presents unique risks. Unlike a mutual fund which is priced at its Net Asset Value (NAV) once per trading day, the price of an ETF fluctuates throughout the day. The market price of an ETF can differ from the NAV of the fund's holdings. This variance can be both positive (overvalued) and negative (undervalued) relative to the value of the fund's holdings.

We employ a “buy and hold” approach to asset management based on the tenets of Modern Portfolio Theory. The practice of this style of asset management is based on the belief that no one can time the market. The focus for the investor should be how much the investor can risk losing and how long they are willing to keep money in the market.

TDCA adheres to the following principles:

- Markets are efficient and for investing purposes assets are fairly priced
- Diversification reduces the risk of uncertainty and asset allocation in numerous asset classes often determines results in the portfolio.

The Money4Front application has been designed such that Licensee created portfolios will be diversified both across Assets Class, Asset Category and among the varying securities within each asset class (i.e., you have exposure to a large number of individual stocks by investing in funds). Asset Class examples include:

- US Equity Growth Funds
- US Income Funds
- Growth & Income Stocks
- US Government Bond Funds

If you invest in securities, you could lose money. Licensees should be prepared for potential losses.

Our portfolios have been constructed without considering potential tax consequences to the Licensee. The Licensee is responsible for any tax liabilities resulting from transactions (including any arising from the addition of assets to or withdrawal of assets from the Licensee’s account). Licensees are urged to seek the advice of qualified tax professionals and to use all available resources to educate themselves about investing in general, as well as the investments and portfolio composition recommended by TDCA.

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks:

- Interest-rate Risk: Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- Market Risk: The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security’s particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- Inflation Risk: When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.

- Currency Risk: Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- Reinvestment Risk: This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- Business Risk: These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- Liquidity Risk: Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- Financial Risk: Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan obligations may result in bankruptcy and/or a declining market value.

Item 9: Disciplinary Information

There are no legal or disciplinary events that are material to a Licensee's or prospective Licensee's evaluation of this advisory business or the integrity of our management. The firm and its employees have not been involved in legal or disciplinary events related to past or present investment Licensees.

Item 10: Other Financial Industry Activities and Affiliations

Neither TDCA nor any of its representatives are registered as a securities broker/dealer or a representatives of a broker/dealer. TDCA is not registered as a FCM, CPO or CTA. None of TDCA's representatives are registered as representatives of a FCM or CPO.

Item 11: Code of Ethics, Participation or Interest in Licensee Transactions and Personal Trading

From time-to-time the interests of the principals and employees of TDCA may coincide with those of a Licensee. Securities may be bought, held or sold by a principal or employee of TDCA that are also included in one of our Portfolio market portfolios or held by a Licensee. If potential insider information is inadvertently provided or learned by a principal or employee, it is the policy of TDCA strictly to prohibit its use. No employee of TDCA may act on material non-public information.

It is the policy of TDCA to permit the firm, its employees and Investment Adviser Representatives (IARs) to buy, sell and hold the same securities that we place in our Portfolio Market portfolios. TDCA has no obligation to recommend for purchase or sale a security that TDCA, its principals, affiliates, employees or IARs may purchase, sell, or hold. TDCA has procedures dealing with insider trading, employee-related accounts, "front running" and other issues that may present a potential conflict when such purchase,

sales or recommendations are made. In general, these policies and procedures are intended to eliminate, to the extent possible, the adverse effect on Licensees of any such potential conflicts of interest.

Item 12: Brokerage Practices

TDCA does not offer Investment Supervisory Services. As such, we do not maintain any set brokerage practices.

Item 13: Review of Accounts

TDCA does not offer Investment Supervisory Services. As such, we do not review the investment accounts of the Licensees.

Item 14: Licensee Referrals and Other Compensation

Many of our Licensees enjoy the benefits of our software for free or at a discounted rate. To offset our costs, we also receive compensation from a select group of partner companies that market products and services to our Licensees. Partner ads will appear throughout our website. Additionally, a list of our Partners can be found in our Partner Directory. Compensation arrangements vary widely, but typically fall into one of the following categories;

Online Advertising: We may receive compensation from Partners who advertise on our website in the following ways:

- (1) Pay-per-Impression ("PPM"): Under the PPM Scenario, we receive compensation based on the number of times our Licensees collectively view a Partner advertisement ("Page Views") while visiting our site during a given period.
- (2) Pay-per-Click ("PPC"): Under the PPC Scenario, we receive compensation from a Partner when one of our Licensees clicks on a partner advertisement.
- (3) Pay-per-Action ("PPA"): Under the PPA Scenario, we receive compensation from a Partner when one of our Licensees clicks on a partner advertisement and makes a purchase. Compensation could include a one-time fee, or a fee-splitting arrangement where we receive a portion of the proceeds from a Licensee purchase.

Targeted Advertisement: Some Partners prefer to market to a specific sub-set of our Licensees directly through the use of a targeted e-mail or message transmitted to the Licensee through the Money4Front Application and interface. Only Licensees who have agreed to permit such third-party solicitation will be contacted. Under this scenario, compensation from the Partner could include a one-time fee, or a fee-splitting arrangement where we receive a portion of the proceeds from a Licensee purchase.

Licensee Referral: Each of our Licensees faces a unique personal financial situation. Some of our Licensees would clearly benefit from a variety of services or products that we do not offer, such as credit monitoring or advice from financial experts or Certified Financial Planners ("CFPs"). In certain circumstances, we may contact Licensees to gauge their interest in these services or products. If the

Licensee replies affirmatively, with the Licensee's permission, we would forward the Licensee's contact information to the Partner, who would then contact the Licensee directly. Under this scenario, compensation from the Partner could include a one-time fee, or a fee-splitting arrangement where we receive a portion of the proceeds from a Licensee purchase.

Premium Portfolios: At present, we do not have third-party created portfolios included with our Premium Portfolios. However, in the future we intend to do so. Compensation we receive from these third-parties shall include, but not be limited to, vendor registration, portfolio listing fees, and shared revenues from the sale of portfolios.

Advisor Referral Service ("ARS"): We expect to receive compensation for advisory firms that we participate in both the Turn-Key and Find A Coach Services. Fees include, but are not limited to, a portion of management fees, advisor registration and directory listing.

Item 15: Custody

We do not provide Investment Supervisory Services and therefore do not maintain custody of Licensee accounts.

Item 16: Investment Discretion

Online Subscription Services: We do not provide Investment Supervisory Services and therefore do not exercise discretion over the accounts of our Online Subscription Services Licensees.

Investment Supervisory Services:

We do not provide Investment Supervisory Services. As such, we do not exercise discretion over the accounts of our Licensees. However, we do have two services that pair Licensees with qualified third-party advisors who may have discretion over a Licensee's account.

Item 17: Voting Licensee Securities

We do not provide Investment Supervisory Services. As such, we offer no advice regarding the voting of Licensee securities.

Item 18: Financial Condition

TDCA does not have any financial impairment that will preclude the firm from meeting contractual commitments to Licensees. A balance sheet is not required to be provided because TDCA does not provide Investment Supervisory Services, serve as a qualified custodian for Licensee funds or securities, and does not charge nor require prepayment of advisory fees.

Brochure Supplement (Part 2B of Form ADV - Advisory Personnel)**Education and Business Standards**

TDCA requires that advisors in its employ must have relevant education and/or work experience that demonstrates their aptitude for financial planning and investment management. All advisors are registered with the SEC, having attained Registered Investment Advisor (RIA) status via professional examination.

David B. Hirsch, President and CEO

David B. Hirsch is the Company's Founder, President and CEO. Prior to founding the Company, Mr. Hirsch was the President & CEO of Oragenics, Inc., a publicly-traded biotechnology company (Symbol: OGEN). Prior to joining Oragenics, Mr. Hirsch operated a boutique legal and investment banking practice with a focus on advising and financing distressed, publicly-traded, emerging technology companies. Mr. Hirsch is also the Founder and Managing Director of Method Capital Management, LLC, a Commodities Trading Advisor registered with the NFA and the CFTC. Mr. Hirsch is a licensed attorney in the States of Indiana and Florida and has experience in corporate restructuring as a Manager at a "Big 4" firm and in venture capital as an Associate with a venture firm in Silicon Valley. Mr. Hirsch has earned an MSIA (MBA) from the Tepper Graduate School of Business at Carnegie Mellon University, a JD from Drake University Law School, and a BA in Economics from Indiana University. He also holds the Series 65 and Series 3 Securities Licenses.

Disciplinary Information: Not Applicable

Other Business Activities: Mr. Hirsch also practices law and provides strategic and financial consulting services on a part-time basis.

Additional Compensation: Legal & Consulting Practice.

Disciplinary Information: Not Applicable